

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

UGOCHUKWU GOODLUCK NWAUZOR,
FERNANDO AGUIRRE-URBINA,
individually and on behalf of all those
similarly situated,

Plaintiffs/Counter-Defendants,

v.

THE GEO GROUP, INC.,

Defendant/Counter-Claimant.

Case No. 3:17-cv-05769-RJB

**DECLARATION OF COLIN L. BARNACLE
IN SUPPORT OF DEFENDANT THE GEO
GROUP, INC.'S OPPOSITION TO
PLAINTIFFS' MOTIONS IN LIMINE**

I, Colin L. Barnacle, make the following statement under oath subject to the penalty of perjury pursuant to the laws of the United States and the State of Washington:

1. I am the attorney for The GEO Group, Inc. in the above-captioned matter. I am over the age of eighteen (18), and I am competent to testify in this matter.

2. During conferrals with counsel for the State of Washington and Private Plaintiffs ("Plaintiffs"), GEO stipulated to the admissibility of over 100 proposed exhibits. The State of Washington and Private Plaintiffs disputed the admissibility of every exhibit proposed by GEO, including GEO's Detainee Handbook (Exhibit A-13) which has been repeatedly relied upon by both parties in this case and is listed on Plaintiffs' exhibit list as Exhibit 19. Likewise, the Plaintiffs listed the Declaration of Tae Johnson (Exhibit 205) and a number of versions of the Voluntary Work Program Agreement on their exhibit list (Exhibits 229, 24), but dispute the admissibility of those exhibits on GEO's proposed list (Exhibits A-228, A-229, A-221).

3. Attached are true and correct copies of the following exhibits:

EXHIBIT A: Attached as Exhibit A are excerpts from the deposition of Ugochukwu Nwauzor taken June 19, 2018.

EXHIBIT B: Attached as Exhibit B is Exhibit 22 to the deposition of Fernando Aguirre-Urbina taken June 11, 2018.

Dated this 23rd day of March, 2020 at Denver, Colorado.

Akerman, LLP

s/ Colin L. Barnacle

Colin L. Barnacle, (Admitted *pro hac vice*)
Attorney for Defendant The GEO Group, Inc.

PROOF OF SERVICE

I hereby certify on the 23rd day of March 2020, pursuant to Federal Rule of Civil Procedure 5(b), I electronically filed and served the foregoing **DECLARATION OF COLIN L. BARNACLE IN SUPPORT OF DEFENDANT THE GEO GROUP, INC.'S OPPOSITION TO PLAINTIFFS' MOTIONS IN LIMINE** via the Court's CM/ECF system on the following:

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